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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EDEN FOODS, INC.,

Plaintiff,

vs.

EDEN HOLISTICS, INC.,

Defendants.

Case No.: 2:24-cv-01574-GMN-NJK

**STIPULATION AND
ORDER FOR EXTENSION OF
DEADLINES RELATED TO
PLAINTIFF'S MOTION TO STRIKE
AFFIRMATIVE DEFENSES [ECF
NO.24]**

[FIRST REQUEST]

COME NOW, Plaintiff, Eden Foods, Inc., ("Eden Foods") by and through its counsel of record, Christopher Kelly, Esq. and Adrienne J. Kosak, Esq. of Wiley Rein LLP and Chad C. Butterfield, Esq. of Wilson, Elser, Moskowitz, Edelman & Dicker, LLP, and Defendant Eden Holistics, Inc., ("Holistics") by and through their counsel of record, H. Stan Johnson Esq., and Ryan D. Johnson, Esq., of Cohen Johnson, LLC., do hereby stipulate and agree as follows:

WHEREAS Plaintiff Eden Foods filed their Motion to Strike Affirmative Defenses on March 11, 2025 (ECF No. 24) ("Motion");

WHEREAS Defendant's current deadline to file and serve its Response to Plaintiff's Motion ("Response") is set as **Tuesday, March 25, 2025;**

WHEREAS as Defendant requires additional time to respond to Plaintiff's Motion, and to

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1 consult with their client regarding voluntarily withdrawing a number of the contested affirmative
2 defenses, the parties have agreed to extend the deadline for Defendant to file and serve their
3 Response;

4 WHEREAS, the parties have met and conferred and have stipulated and agreed to extend
5 the response deadlines to Plaintiff's Motion as follows:
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- 7 • Defendant Eden Holistics shall have until **Tuesday, April 1, 2025**, to file its
8 Response to Plaintiff's Motion (ECF No. 24).
- 9 • Plaintiff Eden Foods shall have until **seven (7) days** after Plaintiff has filed its
10 Response to file any Reply (LR 7-2 (b)).
- 11 • The Court has not yet set a hearing date on Plaintiff's Motion, therefore no
12 rescheduling of a hearing date is necessary at this time.

13 WHEREAS, the parties respectfully request that this Court order the following and submit
14 that this, their first such stipulation and request for an extension of the above-deadlines, is
15 submitted in good faith and not for the purposes of delay:
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- 17 • Defendant Eden Holistics shall have until **Tuesday, April 1, 2025**, to file its
18 Response to Plaintiff's Motion (ECF No. 24).

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- Plaintiff Eden Foods shall have until **seven (7) days** after Defendant has filed its Response to file any Reply (LR 7-2 (b)).

SO STIPULATED.

DATED this 25th day of March 2025.

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

BY: /s/ Chad. C. Butterfield
CHAD C. BUTTERFIELD, ESQ. (SBN
10532)
6689 Las Vegas Blvd., Ste 200
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-and-

WILEY REIN LLP
Christopher Kelly (Pro Hac Vice)
Adrienne J. Kosak (Pro Hac Vice)
2050 M Street, N.W.
Washington, D.C. 20036
Attorneys for Plaintiff

DATED this 25th day of March 2025

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BY: /s/ H. Stan Johnson
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IT IS SO ORDERED


UNITED STATES MAGISTRATE JUDGE

DATED: March 26, 2025

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